## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON TALCUM POWDER PRODUCTS MARKETING, SALES PRACTICES AND PRODUCTS LIABILITY LITIGATION

\_\_\_\_\_

This relates to all cases listed on Exhibit A

MDL No. 3:16-md-02738

NOTICE OF MOTION TO DISMISS PLAINTIFFS' COMPLAINTS PURSUANT TO RULE 41(b)

**TO:** All Counsel of Record

#### **COUNSEL:**

**PLEASE TAKE NOTICE** that Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc. ("Defendants"), will move before this Court on November 2, 2020, or as soon thereafter as counsel may be heard, pursuant to Fed. R. Civ. P. 41(b), for an Order dismissing plaintiffs' complaints for failure to comply with this Court's May 15, May 26, June 4, September 17, and September 19, 2020 Orders.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion to Dismiss, Defendants will rely upon the accompanying Letter Brief in Support.

PLEASE TAKE FURTHER NOTICE that a Proposed Order is attached.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

### Respectfully submitted,

/s/ Susan M. Sharko

Susan M. Sharko

# FAEGRE DRINKER BIDDLE & REATH LLP

600 Campus Drive

Florham Park, NJ 07932-1047 Telephone: (973) 549-7000 Facsimile: (973) 360-9831

Email: susan.sharko@faegredrinker.com

Attorneys for Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc.

Dated: September 29, 2020

### **EXHIBIT A**

| No. | MDL Case Number | Plaintiff Name        | Law Firm<br>Name          |
|-----|-----------------|-----------------------|---------------------------|
| 1.  | 3:18-cv-00012   | BENNINGTON, STAVROULA | Beasley Allen             |
| 2.  | 3:19-cv-14787   | BOWERS, VIRGINIA      | Beasley Allen             |
| 3.  | 3:17-cv-10456   | CARTER, DIANE         | Beasley Allen             |
| 4.  | 3:18-cv-03680   | COLLINS, VALERIE      | Beasley Allen             |
| 5.  | 3:17-cv-06861   | ELLIS, MELISSA        | Beasley Allen             |
| 6.  | 3:17-cv-10381   | JOHNSON, ELIZABETH    | Beasley Allen             |
| 7.  | 3:19-cv-20237   | KIDDER, LOREE         | Beasley Allen             |
| 8.  | 3:19-cv-20208   | MITCHELL, COLLEEN     | Beasley Allen             |
| 9.  | 3:17-cv-09684   | NEAL, MICHELLE        | Beasley Allen             |
| 10. | 3:18-cv-11246   | WARNELL, MARGARET     | Beasley Allen             |
| 11. | 3:18-cv-05588   | SWANGIM, JERRIANNE    | Blizzard Law,<br>PLLC     |
| 12. | 3:18-cv-02366   | ADKINS, BERNADINE     | Johnson Law<br>Group      |
| 13. | 3:20-cv-03343   | AMATO, FELICIA        | Johnson Law<br>Group      |
| 14. | 3:19-cv-00987   | HOUSLEY, YVONNE       | Johnson Law<br>Group      |
| 15. | 3:17-cv-09678   | SHARON, MARCHESE      | Morelli Law<br>Firm, PLLC |

| No. | MDL Case Number | Plaintiff Name                | Law Firm<br>Name        |
|-----|-----------------|-------------------------------|-------------------------|
| 16. | 3:17-cv-01502   | HARRIS, JEANNE                | Morris Bart,<br>LLC     |
| 17. | 3:18-cv-10712   | RICHARD, DALE                 | Morris Bart,<br>LLC     |
| 18. | 3:18-cv-16103   | SULLIVAN, MARGARET            | Morris Bart,<br>LLC     |
| 19. | 3:16-cv-08963   | WALKER, SARAH                 | Morris Bart,<br>LLC     |
| 20. | 3:17-cv-10642   | CROFT, GLENDA                 | Morris Law<br>Firm      |
| 21. | 3:19-cv-05458   | THE ESTATE OF, NOLA<br>WALKER | Napoli<br>Shkolnik PLLC |
| 22. | 3:18-cv-15736   | BRUNDIDGE, BETTY              | OnderLaw,<br>LLC        |
| 23. | 3:19-cv-19637   | DOBRZELEWSKI, LYNNE           | OnderLaw,<br>LLC        |
| 24. | 3:20-cv-02662   | TAYLOR, JENNIFER              | OnderLaw,<br>LLC        |
| 25. | 3:19-cv-18063   | WHITLEY, LOIS                 | OnderLaw,<br>LLC        |
| 26. | 3:20-cv-01339   | FELDMAN, ANNA MARIA           | The Driscoll<br>Firm    |
| 27. | 3:19-cv-01822   | OINONEN, CATHLEEN             | The Miller<br>Firm LLC  |
| 28. | 3:20-cv-01466   | CHAPIN, DEBRA                 | Trammell PC             |
| 29. | 3:19-cv-14466   | COLEMAN, GEORGIA              | Trammell PC             |

| No. | MDL Case Number | Plaintiff Name    | Law Firm<br>Name |
|-----|-----------------|-------------------|------------------|
| 30. | 3:19-cv-14560   | DOUGLAS, MATRELLE | Trammell PC      |
| 31. | 3:19-cv-09336   | HANNAH, CAROL     | Trammell PC      |
| 32. | 3:20-cv-02191   | JACKSON, MELINDA  | Trammell PC      |